

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:

RHODIUM ENCORE, LLC, et al.,

Debtor.

Chapter 11

Case No. 24-90448 (ARP) (Bankr.  
S.D.Tex.)

345 PARTNERS SPV2 LLC, GRANT  
FAIRBAIRN, AS TRUSTEE AND ON BEHALF  
OF GRANT FAIRBAIRN REVOCABLE TRUST,  
NINA FAIRBAIRN, AS TRUSTEE AND ON  
BEHALF OF NINA CLAIRE FAIRBAIRN  
REVOCABLE TRUST, RICHARD  
FULLERTON, WILLIAM HO, AS TRUSTEE  
AND ON BEHALF OF GR FAIRBAIRN  
FAMILY TRUST, NCF EAGLE TRUST, GRF  
TIGER TRUST, AND NC FAIRBAIRN FAMILY  
TRUST, SCOTT KINTZ, AS TRUSTEE AND ON  
BEHALF OF KINTZ FAMILY TRUST, JACOB  
RUBIN, TRANSCEND PARTNERS LEGEND  
FUND LLC, VALLEY HIGH LP, JERALD  
WEINTRAUB, AS TRUSTEE AND ON  
BEHALF OF JERALD AND MELODY HOWE  
WEINTRAUB REVOCABLE LIVING TRUST  
DTD 02/05/98, AS AMENDED, AND MIKE  
WILKINS, AS TRUSTEE AND ON BEHALF OF  
WILKINS-DUIGNAN 2009 REVOCABLE  
TRUST,

Adv. Pro. No. 25-04008

Plaintiffs,

v.

NATHAN NICHOLS, CHASE BLACKMON,  
CAMERON BLACKMON, NICHOLAS  
CERASUOLO, AND IMPERIUM  
INVESTMENT HOLDINGS, LLC.,

Defendants.

**NOTICE OF AGREED PROPOSED ORDER**

PLEASE TAKE NOTICE that the Plaintiffs,<sup>1</sup> Defendants,<sup>2</sup> and Proposed Intervenor-Defendant<sup>3</sup> (together, the “Parties”) have agreed to the proposed agreed order attached hereto.

Dated: April 10, 2025

Respectfully submitted,

SHANNON & LEE LLP

/s/R. J. Shannon

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*Counsel to Defendant Nicholas Cerasuolo*

### **CERTIFICATE OF SERVICE**

I hereby certify that on February 25, 2025, the forgoing document was served through the Court’s CM/ECF System on all parties registered to receive such service.

/s/R. J. Shannon

R. J. Shannon

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<sup>1</sup> The Plaintiffs are 345 Partners SPV2 LLC, Grant Fairbairn, as Trustee and on behalf of Grant Fairbairn Revocable Trust, Nina Fairbairn, as Trustee and on behalf of Nina Claire Fairbairn Revocable Trust, Richard Fullerton, William Ho, as Trustee and on Behalf of GR Fairbairn Family Trust, NCF Eagle Trust, GRF Tiger Trust, and NC Fairbairn Family Trust, Scott Kintz, as Trustee and on behalf of Kintz Family Trust, Jacob Rubin, Transcend Partners Legend Fund LLC, Valley High LP, Jerald Weintraub, as Trustee and on Behalf of Jerald and Melody Howe Weintraub Revocable Living Trust Dtd 02/05/98, as amended, and Mike Wilkins, as Trustee and on behalf of Wilkins-Duignan 2009 Revocable Trust.

<sup>2</sup> The Defendants are Nathan Nichols, Chase Blackmon, Cameron Blackmon, Nicholas Cerasuolo, and Imperium Investment Holdings, LLC.

<sup>3</sup> The Proposed Intervenor-Defendant is the Special Committee of the Board of Directors of Rhodium Enterprises, Inc.